

# **EXHIBIT 1**

**From:** Allan Miller <allan.miller@alumni.stanford.edu>  
**Sent:** Monday, March 18, 2024 3:38 PM  
**To:** Taylor, William M.  
**Cc:** Ladner, Matthew; Marigoni, Nathan R.  
**Subject:** Re: Utah Litigation

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Hello Mr. Taylor:

Thank you for the offer, and thank you for discussing it on the phone with me last week.

However, I have decided to decline this proposal at this time.

Allan Miller

On Tue, Mar 12, 2024 at 6:53 PM Taylor, William M. <[William.Taylor@troutman.com](mailto:William.Taylor@troutman.com)> wrote:

Good evening Mr. Miller:

I write regarding the Utah litigation. My understanding is that you are attempting to serve Sridhar Santhanam, Pavan Vaish, and Kalaari in India.

My thought is that disagreements over the propriety of service is not a great use of the parties' time and efforts. Moreover, there is likely to be substantial overlap between the positions taken by HFN and Kumar Shiralagi in their motions to dismiss, and the positions that Sridhar Santhanam, Pavan Vaish, and Kalaari will take in this litigation.

I therefore make the following proposal: Sridhar Santhanam, Pavan Vaish, and Kalaari will not contest the service of process in India. In return, you will grant those defendants an extension to respond until 21 days after the Court rules on the motions to dismiss on behalf of HFN and Kumar Shiralagi.

We expect that the Court will appreciate how this proposal will lessen the burdens on the parties, as well as the Court itself.

Please let us know if you agree to this proposal.

Regards,

Will

**William M. Taylor**

**Partner**

Direct: 617.204.5186

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**troutman pepper**

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